

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND

BALTIMORE-NIGHT BOX
2022 JUL -1 PM 4:09
U.S. BANKRUPTCY COURT
DISTRICT OF MARYLAND

AMANDA NORRIS, et al

Plaintiffs,

v.

PNC BANK, N.A., et al

Defendants,

Case No. 1:20-cv-03315-ELH FILED ENTERED
LODGED RECEIVED

JUL 1 2022

PLAINTIFFS' MOTION FOR EXTENSION OF TIME

CLERK U.S. DISTRICT COURT
DISTRICT OF MARYLAND
NIGHT DROP BOX

Plaintiffs, Amanda and Joseph Norris III, request a 20 day Extension of Time to file a Motion for Reconsideration and in support, states as follows:

MEMORANDUM

The Court's Memorandum Opinion (ECF 156) and Order (ECF 157) dated June 16, 2022 granting in part and denying in part defendants' motions for summary judgment was not mailed to Plaintiffs. When Plaintiffs called to find out why we had not yet received the documents in the mail, we were informed that the Clerk's office mistakenly mailed the Opinion and Order to Mr. Jefferies. It is Plaintiffs' understanding that the Clerk's office did not know we were self-represented. Plaintiffs requested that the Clerk's office mail us a copy.

Out of abundance of caution, Plaintiffs would like an extension of time to reserve and/or preserve any rights we have to file a motion for reconsideration if we desire to do so.

Plaintiffs reached out to defendant, Safeguard, and Safeguard does not agree because the Court has made its decision.

Defendant, PNC, did agree. Also, the attorney for PNC is going to FedEx a copy of the documents. In addition, PNC indicated that it will be filing a motion for reconsideration with regards to punitive damages which Plaintiffs naturally will oppose.

STATEMENT OF LEGAL AUTHORITY

Under Federal Rule of Civil Procedure 56(e)(1)(4), *Harrods Ltd. v. Sixty Internet Domain Names*, 302 F.3d 214, 244-45 (4th Cir. 2002) (internal citations omitted) and based on the attached Memorandum this Court has discretion to extend the time period.

Rule 6(b)(B) states, "the court may, for good cause, extend time:...on motion made after the time has expired if the party failed to act because of excusable neglect".

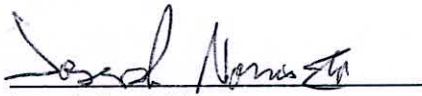
Local Rule 105.10 provides that "any motion to reconsider any order issued by the Court shall be filed not later than fourteen days after entry of the order." See, e.g., *Direct Benefits, LLC v. TAC Fin., Inc.*, RDB-13-1185, 2019 WL 3804513, at *4 (D. Md. Aug. 13, 2019); *Humane Soc. Of U.S. v. Nat'l Union Fire Ins. Co. of Pittsburgh*, DKC-13-1822, 2017 WL 146007, *5 (D.MD. Apr. 21, 2017).

Fed. R. Civ. P. 6(d): deadline automatically extended 3 days if party is notified by mail.

This will not prejudice the defendants in anyway.

Wherefore, for all the reasons herein, and in the interest of fairness and justice, Plaintiffs hope that this Court will grant our request.

Respectfully Submitted,


Joseph Norris III


Amanda Norris
8616 Inwood Rd.
Windsor Mill, MD 21244
(443) 418-9414

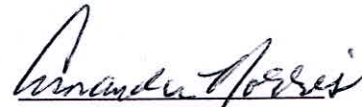
CC: Mr. Chris Jefferies

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on July 1, 2022, I caused a true and correct copy of the foregoing Plaintiffs' Motion for Extension of Time was served via first class mail, postage prepaid, upon the following:

Daniel J. Tobin, Ballard Spahr LLP, 1909 K. St., N.W., 12th Floor, Washington, DC 20006, Counsel for Defendant PNC Bank, N.A.

Matthew Berkowitz, Carr Maloney, 2000 Pennsylvania Ave., N.W., Suite 8001, Washington, DC 20006, Counsel for Defendant Safeguard Properties


Amanda Norris

Office of the Clerk
United States District Court
Baltimore, MD 21201
www.mdd.uscourts.gov
OFFICIAL BUSINESS

BALTIMORE-NIGHT BOX
2022 JUL -1 PM 4:09
U.S. BANKRUPTCY COURT
DISTRICT OF MARYLAND

FILED _____ ENTERED _____
LOGGED _____ RECEIVED _____
JUL 1 2022
CLERK U.S. DISTRICT COURT
DISTRICT OF MARYLAND
Night Drop Box

CV5